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November 4, 2016

Re: Daniels, et al., v. City of N.Y., et al., No. 16 Civ. 190 (PKC) (JO)

Dear Judge Orenstein:

I represent Plaintiffs in this action and I write to submit the Parties' joint status report. The newest development in this case is that Assistant Corporation Counsel Tobias Zimmerman will very shortly file a notice of substitution with the Court and will represent Defendants going forward. Mr. Zimmerman is still in the process of getting himself up to speed on the case file.

The depositions of the Individual Defendants have been noticed for November 30, December 1 and December 9. Mr. Zimmerman is in the process of confirming the Defendants' attendance and/or suggesting alternate dates. At this writing, the Defendants' relevant disciplinary material remains a category of outstanding discovery. A Protective Order is already in place and Plaintiffs have requested that Defendants raise any objections they have to production of these records by next week to allow for the resolution of any dispute before depositions.

In terms of paper discovery, there have been significant productions by all Parties. Defendants are preparing for production of additional documents responsive to Plaintiffs' discovery demands. As always, in the event a discovery dispute arises that the Parties cannot resolve informally, the Parties will file appropriate motions promptly.

The Parties are also awaiting various subpoena responses from third parties.

In light of the foregoing, the Parties expect that they will be able to complete fact discovery by the December 16, 2016, deadline presently on the docket.

Thank you,

A handwritten signature in blue ink that reads "Ryan Lozar".

Ryan Lozar